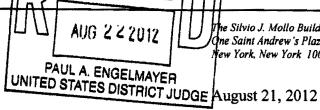
U.S. Department of Justice



United States Attorney Southern District of New York



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MEMO ENDORSED

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED:

## BY HAND

The Honorable Paul A. Engelmayer United States District Judge Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street, Room 660 New York, New York 10007

> Re: United States v. Lebanese Canadian Bank SAL, et al.,

11 Civ. 9186 (PAE)

Dear Judge Engelmayer:

The Government respectfully submits for the Court's consideration a proposed Stipulation and Order of Settlement (the "Proposed Order") relating to claimant Mansour Brothers Trading Inc., d/b/a Mansour Brothers Auto Trading ("Mansour Brothers"). The Proposed Order provides for the forfeiture of the contents of two bank accounts by Mansour Brothers (the "Proposed Forfeited Funds").

On May 30, 2012, certain insurance companies (the "Insurance Company Claimants") filed claims in this action for, inter alia, all assets of Mansour Brothers, including the Proposed Forfeited Funds. Counsel for the Insurance Company Claimants has indicated that the Insurance Company Claimants have no objection to the entry of the Proposed Order as long as the Proposed Forfeited Funds are maintained by the United States until the claims of the Insurance Company Claimants to those funds are resolved in this action and provided that the Order is without prejudice to any claim they may have to the Proposed Forfeited Funds in this action or any claim in any other action.

Hon. Paul A. Engelmayer August 21, 2012 Page 2

Accordingly, the Government respectfully requests that the Court (1) enter the Proposed Order and (2) order that the Proposed Forfeited Funds be maintained by the United States during the pendency of the Insurance Company Claimants' claims in this action for the Proposed Forfeited Funds.

Respectfully submitted,

PREET BHARARA
United States Attorney for the
Southern District of New York

By:

Sharon Cohen Levin Michael D. Lockard Jason H. Cowley Alexander J. Wilson

Assistant United States Attorneys (212) 637-1060/2193/2479/2453

cc: Timothy Shusta, Esq. (by email)

SO ORDERED:

HONORABLE PAUL A ENGELMAYER UNITED STATES DISTRICT JUDGE

The Proposed Forfeited Funds must be maintained by the United States during the pendency of the Insurance Company Claimants, claims in this action.